

Exhibit B

TOPICS OF EXAMINATION FOR DEPOSITION

DEFINITIONS

The definitions set forth in Movant's Requests for Production of Documents are hereby incorporated by reference as if fully set forth herein.

INSTRUCTIONS

A. For the subject matter in this notice, LBHI shall designate one or more of its officers, directors, managing agents, or employees who are most knowledgeable with respect to the subject matter.

B. For each designee, LBHI shall identify the names, titles or positions, and subject matter on which each designee will provide testimony at least ten days in advance of the deposition.

C. Designees shall testify as to matters known or reasonably available to LBHI.

TOPICS OF EXAMINATION

1. Communications, whether internal or external, between LBHI and any party regarding the Amended Loan Agreements or the Loan Modification Agreement, including but not limited to negotiations with Swig Equities.

2. Communications, whether internal or external, between LBHI and any party regarding 25 Broad LLC, the Project, the Exchange or the South Wing Demolition.

3. Communications, whether internal or external, between LBHI and any party regarding 45 Broad LLC.

4. Communications, whether internal or external, between LBHI and any party regarding the Part 20 Plan and the withdrawal of the Part 23 Plan.

5. The circumstances surrounding LBHI's refusal to consent to the South Wing demolition.

6. The circumstances surrounding LBHI's request that 25 Broad LLC enter into a Forbearance Agreement.

7. LBHI's refusal, once it declared bankruptcy, to fund the remaining unfunded portion of the loan agreed upon in the Loan Agreement to pay for construction related expenses and accounts payable.